

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 Count 1: 18 U.S.C. § 371 - Conspiracy
 Count 2: 18 U.S.C. §§ 922(u) and 2 - Theft from a Federal
 Firearms Licensee
 Count 3: 18 U.S.C. § 922(j) - Possession of a Stolen Firearm

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: SEE ATTACHED.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

DASHAWN TALIFARIO TAYLOR

DISTRICT COURT NUMBER
4:20-cr-00301 JST**FILED**

Jul 23 2020

 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms and Explosives

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:
☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☒ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

4-20-70910 MAG

 Name and Office of Person
 Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned) Samantha Schott Bennett
DEFENDANT**IS NOT IN CUSTODY**
 1) ☒ Has not been arrested, pending outcome this proceeding.
 If not detained give date any prior
 summons was served on above charges
2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
**DATE OF
ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

PENALTY SHEET FOR DASHAWN TALIFARIO TAYLOR

Count One: Conspiracy, in violation of 18 U.S.C. § 371

Maximum term of imprisonment: 5 years

Maximum term of supervised release: 3 years

Maximum fine: \$250,000

Forfeiture

Possible Restitution

Count Two: Theft of Firearms from a Federal Firearms Licensee, in violation of 18 U.S.C. §§ 922(u) and 2

Maximum term of imprisonment: 10 years

Maximum term of supervised release: 3 years

Maximum fine: \$250,000

Forfeiture

Possible Restitution

Count Three: Possession of a Stolen Firearm, in violation of 18 U.S.C. § 922(j)

Maximum term of imprisonment: 10 years

Maximum term of supervised release: 3 years

Maximum fine: \$250,000

Forfeiture

Possible Restitution

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 Count 1: 18 U.S.C. § 371 - Conspiracy
 Count 2: 18 U.S.C. §§ 922(u) and 2 - Theft from a Federal
 Firearms Licensee

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: SEE ATTACHED.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

▶ LEVYONNE IGNACIO-BOOTH

DISTRICT COURT NUMBER
4:20-cr-00301 JST**FILED**

Jul 23 2020

 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms and Explosives

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☒ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

4-20-70910 MAG

 Name and Office of Person
 Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned) Samantha Schott Bennett
DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

 1) ☒ If not detained give date any prior
 summons was served on above charges ▶
2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
**DATE OF
ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

PENALTY SHEET FOR LEVYONNE IGNACIO-BOOTH

Count One: Conspiracy, in violation of 18 U.S.C. § 371

Maximum term of imprisonment: 5 years

Maximum term of supervised release: 3 years

Maximum fine: \$250,000

Forfeiture

Possible Restitution

Count Two: Theft of Firearms from a Federal Firearms Licensee, in violation of 18 U.S.C. §§ 922(u) and 2

Maximum term of imprisonment: 10 years

Maximum term of supervised release: 3 years

Maximum fine: \$250,000

Forfeiture

Possible Restitution

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

Count 1: 18 U.S.C. § 371 - Conspiracy
 Count 2: 18 U.S.C. §§ 922(u) and 2 - Theft from a Federal
 Firearms Licensee
 Count 4: 18 U.S.C. § 922(g)(1) - Felon in Possession of a
 Firearm

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: SEE ATTACHED.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

▶ ANTHONY LAMAR CRAFT, JR.

DISTRICT COURT NUMBER
4:20-cr-00301 JST**FILED**

Jul 23 2020

SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms and Explosives

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☒ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

4-20-70910 MAG

Name and Office of Person

Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Samantha Schott Bennett

DEFENDANT**IS NOT IN CUSTODY**

1) ☒ Has not been arrested, pending outcome this proceeding.
 If not detained give date any prior
 summons was served on above charges ▶

2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes
 been filed? ☐ No

If "Yes"
 give date
 filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

PENALTY SHEET FOR ANTHONY LAMAR CRAFT, JR.

Count One: Conspiracy, in violation of 18 U.S.C. § 371

Maximum term of imprisonment: 5 years

Maximum term of supervised release: 3 years

Maximum fine: \$250,000

Forfeiture

Possible Restitution

Count Two: Theft of Firearms from a Federal Firearms Licensee, in violation of 18 U.S.C. §§ 922(u) and 2

Maximum term of imprisonment: 10 years

Maximum term of supervised release: 3 years

Maximum fine: \$250,000

Forfeiture

Possible Restitution

Count Four: Felon in Possession of a Firearm, in violation of 18 U.S.C. § 922(g)(1)

Maximum term of imprisonment: 10 years

Maximum term of supervised release: 3 years

Maximum fine: \$250,000

Forfeiture

Possible Restitution

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 Count 1: 18 U.S.C. § 371 - Conspiracy
 Count 2: 18 U.S.C. §§ 922(u) and 2 - Theft from a Federal
 Firearms Licensee

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: SEE ATTACHED.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

▶ TYRONZA HAMPTON, JR.

DISTRICT COURT NUMBER
4:20-cr-00301 JST**FILED**

Jul 23 2020

 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms and Explosives

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:
☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☒ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

4-20-70910 MAG

Name and Office of Person

Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. AgencyName of Assistant U.S.
Attorney (if assigned)

Samantha Schott Bennett

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior
summons was served on above charges ▶
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☒ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
**DATE OF
ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Bail Amount: _____

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET FOR TYRONZA HAMPTON, JR.

Count One: Conspiracy, in violation of 18 U.S.C. § 371

Maximum term of imprisonment: 5 years

Maximum term of supervised release: 3 years

Maximum fine: \$250,000

Forfeiture

Possible Restitution

Count Two: Theft of Firearms from a Federal Firearms Licensee, in violation of 18 U.S.C. §§ 922(u) and 2

Maximum term of imprisonment: 10 years

Maximum term of supervised release: 3 years

Maximum fine: \$250,000

Forfeiture

Possible Restitution

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: Oakland

UNITED STATES OF AMERICA,

v.

DASHAWN TALIFARIO TAYLOR,
LEVYONNE IGNACIO-BOOTH,
ANTHONY LAMAR CRAFT, JR., and
TYRONZA HAMPTON, JR.,

FILED

Jul 23 2020

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

DEFENDANT.

INDICTMENT

18 U.S.C. § 371 – Conspiracy to Commit Theft of Firearms from a Federal
Firearms Licensee;
18 U.S.C. § 922(u) – Theft of Firearms from a Federal Firearms Licensee;
18 U.S.C. § 922(j) – Possession of a Stolen Firearm;
18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm;
18 U.S.C. § 2 – Aiding and Abetting;
18 U.S.C. § 924(d) and 28 U.S.C. § 2461 – Criminal Forfeiture

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 23rd day of
July, 2020

Lili M. Harrell

Clerk

Nathanael Cousins

Bail, \$ No Bail

Nathanael Cousins, United States Magistrate Judge

1 DAVID L. ANDERSON (CABN 149604)
2 United States Attorney

FILED

Jul 23 2020

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

3
4
5
6
7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION
11

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 DASHAWN TALIFARIO TAYLOR,
16 LEVYONNE IGNACIO-BOOTH,
17 ANTHONY LAMAR CRAFT, JR., and
18 TYRONZA HAMPTON, JR.,
19 Defendants.

) NO. 4:20-cr-00301 JST

) VIOLATIONS: 18 U.S.C. § 371 – Conspiracy to
) Commit Theft of Firearms from a Federal Firearms
) Licensee; 18 U.S.C. § 922(u) – Theft of Firearms
) from a Federal Firearms Licensee; 18 U.S.C. § 922(j)
) – Possession of a Stolen Firearm; 18 U.S.C. §
) 922(g)(1) – Felon in Possession of a Firearm; 18
) U.S.C. § 2 – Aiding and Abetting; 18 U.S.C. § 924(d)
) and 28 U.S.C. § 2461 – Criminal Forfeiture

) OAKLAND VENUE

) **UNDER SEAL**

20
21 INDICTMENT

22 The Grand Jury charges:

23 COUNT ONE: (18 U.S.C. § 371 – Conspiracy to Commit Theft of Firearms from a Federal
24 Firearms Licensee)

25 Introductory Allegations

26 At all times relevant to this Indictment:

27 1. Richardson Tactical maintained a retail store at a location in Hayward, California, in the
28 Northern District of California.

INDICTMENT

2. At all times relevant to this Indictment, Richardson Tactical was licensed to engage in the business of importing, manufacturing, or dealing in firearms, pursuant to the provisions of Chapter 44, Title 18, United States Code.

Object of the Conspiracy

3. On or about May 31, 2020, in the Northern District of California and elsewhere, the defendants,

DASHAWN TALIFARIO TAYLOR,
LEVYONNE IGNACIO-BOOTH,
ANTHONY LAMAR CRAFT, JR., and
TYRONZA HAMPTON, JR.,

did knowingly and willfully conspire and agree together and with each other, and with other persons both known and unknown to the Grand Jury, to steal and unlawfully take and carry away from the person and premises of a person who is licensed to engage in the business of importing, manufacturing, and dealing in firearms, any firearm in the licensee's business inventory that had been shipped or transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(u).

Manner and Means

4. On or about May 31, 2020, Defendants TAYLOR, IGNACIO-BOOTH, CRAFT, and HAMPTON (Defendants), as well as other individuals known and unknown to the Grand Jury, would travel to Richardson Tactical's location in the Northern District of California and would arrive at approximately the same time, outside normal business hours when Richardson Tactical was closed.

5. Defendants CRAFT and HAMPTON would arrive and leave Richardson Tactical's location together in the same vehicle.

6. Defendants TAYLOR, IGNACIO-BOOTH, CRAFT, HAMPTON, and co-conspirators known and unknown to the grand jury would leave their vehicles and congregate in the area in front of Richardson Tactical's premises.

7. Defendants TAYLOR, IGNACIO-BOOTH, CRAFT, HAMPTON, and co-conspirators known and unknown to the grand jury, would work together to gain access to Richardson Tactical's premises using force.

8. Defendants TAYLOR, IGNACIO-BOOTH, CRAFT, HAMPTON, and co-conspirators known and unknown to the grand jury would enter Richardson Tactical's premises together.

9. While inside the premises, Defendants TAYLOR, IGNACIO-BOOTH, CRAFT, HAMPTON, and co-conspirators known and unknown to the grand jury would work individually and together to access display cabinets containing firearms, to remove firearms from the display cabinets, and to remove firearms from the walls of the store.

10. Defendants TAYLOR, IGNACIO-BOOTH, CRAFT, HAMPTON, and co-conspirators known and unknown to the grand jury would leave Richardson Tactical's premises together.

Overt Acts

11. In furtherance of the conspiracy, and to accomplish its objects, defendants TAYLOR, IGNACIO-BOOTH, CRAFT, HAMPTON, and co-conspirators known and unknown to the grand jury have committed various overt acts in the Northern District of California, including but not limited to the following:

(1) On or about May 31, 2020, defendants TAYLOR, IGNACIO-BOOTH, CRAFT, HAMPTON, and co-conspirators known and unknown to the grand jury traveled to Richardson Tactical's location.

(2) Defendant IGNACIO-BOOTH and other co-conspirators broke the window and opened the locked door of Richardson Tactical.

(3) Defendants TAYLOR, IGNACIO-BOOTH, CRAFT, HAMPTON, and co-conspirators known and unknown to the grand jury entered Richardson Tactical's premises.

(4) Defendants TAYLOR, IGNACIO-BOOTH, CRAFT, HAMPTON, and co-conspirators known and unknown to the grand jury broke display cases containing firearms and pulled firearms from a display wall.

(5) Defendants TAYLOR, IGNACIO-BOOTH, CRAFT, HAMPTON, and co-conspirators known and unknown to the grand jury stole and unlawfully took and carried away from Richardson Tactical's premises approximately 31 firearms, including at least 27 firearms that had been shipped or transported from one state to another, or from a foreign nation to the United States.

All in violation of Title 18, United States Code, Sections 371 and 922(u).

COUNT TWO: (18 U.S.C. §§ 922(u) and 2 – Theft of Firearms from a Federal Firearms Licensee)

12. On or about May 31, 2020, in the Northern District of California, defendants,

DASHAWN TALIFARIO TAYLOR,
LEVYONNE IGNACIO-BOOTH,
ANTHONY LAMAR CRAFT, JR., and
TYRONZA HAMPTON, JR.,

did steal and unlawfully take and carry away from Richardson Tactical, a person and premises of a person who is licensed to engage in the business of importing, manufacturing, and dealing in firearms, the following firearms in the licensee's business inventory that had been shipped or transported in interstate and foreign commerce:

	Manufacturer	Model	Caliber	Serial Number	Type
1	Sig Sauer	P365 SAS	9mm	66A818351	Pistol
2	Sig Sauer	P365	9mm	66A800762	Pistol
3	Sig Sauer	1911 Spartan	.45	54E038080	Pistol
4	Sig Sauer	P220R	.45	37C010859	Pistol
5	Sig Sauer	P226 Extreme	.40	47E046069	Pistol
6	Sig Sauer	P320	9mm	58C367731	Pistol
7	Glock	43	9mm	ADZD422	Pistol
8	Glock	43	9mm	ADVY294	Pistol
9	Armcor of the Philippines	M1911-A1 FS	.45	RIA2186813	Pistol
10	Armcor of the Philippines	GI	.45	RIA2188670	Pistol
11	Springfield Armory	1911A1	.45	NM611970	Pistol
12	Springfield Armory	1911A1 MIL-SPEC	.45	NM655992	Pistol
13	Springfield Armory	1911A1	.45	NM596237	Pistol
14	HS Produkt	XD45	.45	XD768613	Pistol
15	HS Produkt	XD9	9mm	AT157126	Pistol
16	Smith & Wesson	SW1911ES	.45	UFB5473	Pistol

17	Beretta, Pietro S.P.A.	92A1	9mm	A230403Z	Pistol
18	Beretta USA Corp	92FS INOX	9mm	BER076804	Pistol
19	CZ	CZ75 D	9mm	D220034	Pistol
20	FNH USA, LLC	FNS-9C	9mm	CSU0056770	Pistol
21	FNH USA, LLC	FN 15	.556	FNCR010761	Rifle
22	FNH USA, LLC	FN 15	.556	FNCR011171	Rifle
23	FNH USA, LLC	FNS-9	9mm	GKU0139343	Pistol
24	RWC Group, LLC	KR-9	9mm	K9C0003324	Rifle
25	Aero Precision	X15	.556	X310017	Rifle
26	Garaysar, Inc.	FEAR-109	12	19GP-00277	Shotgun
27	Radical Firearms, LLC	RF-15	Multi	RD18040	Rifle

and aided and abetted the same, in violation of Title 18, United States Code, Sections 922(u) and 2.

COUNT THREE: (18 U.S.C. § 922(j) – Possession of a Stolen Firearm)

13. On or about June 6, 2020, in the Northern District of California, defendant,

DASHAWN TALIFARIO TAYLOR,

knowingly possessed a stolen firearm, namely, an FNH USA model FNS-9C firearm, bearing serial number CSU0056770, knowing or having reasonable cause to believe it was stolen, and which had been shipped or transported in interstate or foreign commerce before it was stolen, in violation of Title 18, United States Code, Section 922(j).

COUNT FOUR: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)

14. On or about June 18, 2020, in the Northern District of California, the defendant,

ANTHONY LAMAR CRAFT, JR.,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed two firearms, namely, one Sig Sauer P365 SAS pistol and one Sig Sauer P365 pistol, and the firearms were in and affecting interstate and foreign commerce, all in violation of

1 Title 18, United States Code, Section 922(g)(1).

2
3 FORFEITURE ALLEGATION: (18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c) – Gun Forfeiture)

4 15. The factual allegations contained in Counts One through Four of this Indictment are
5 realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture pursuant
6 to the provisions of 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

7 16. Upon conviction of any the offenses alleged in Counts One through Four above, the
8 defendants,

9 DASHAWN TALIFARIO TAYLOR,
10 LEVYONNE IGNACIO-BOOTH,
11 ANTHONY LAMAR CRAFT, JR., and
TYRONZA HAMPTON, JR.,

12 shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearm
13 or ammunition involved in or used in any knowing violation of said offenses.

14 17. If any of the property described above, as a result of any act or omission of the defendant:

- 15 (i) cannot be located upon the exercise of due diligence;
- 16 (ii) has been transferred or sold to, or deposited with, a third party;
- 17 (iii) has been placed beyond the jurisdiction of the court;
- 18 (iv) has been substantially diminished in value; or
- 19 (v) has been commingled with other property which cannot be divided without
- 20 difficulty,

21 any and all interest defendant has in any other property (not to exceed the value of the above forfeitable
22 property) shall be forfeited to the United States pursuant to Title 21, United States Code, Section 853(p),
23 as incorporated by Title 28, United States Code, Section 2461(c).

24 //

25 //

1 All pursuant to 18 U.S.C. § 924(d), 28 U.S.C. § 2461, and Federal Rule of Criminal Procedure
2 32.2.

3 DATED: July 23, 2020

A TRUE BILL.

4 /s/

5 FOREPERSON

6 DAVID L. ANDERSON
7 United States Attorney

8 *Samantha Schott Bennett*

9 SAMANTHA SCHOTT BENNETT
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

FILED

Jul 23 2020

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

CRIMINAL COVER SHEET

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:**CASE NUMBER: 4:20-cr-00301 JST****USA v. DASHAWN TALIFARIO TAYLOR, et al.****CR****Is This Case Under Seal?**Yes ☒ No**Total Number of Defendants:**1 2-7 ☒ 8 or more**Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?**Yes No ☒**Venue (Per Crim. L.R. 18-1):**SF OAK ☒ SJ**Is this a potential high-cost case?**Yes No ☒**Is any defendant charged with a death-penalty-eligible crime?**Yes No ☒**Is this a RICO Act gang case?**Yes No ☒**Assigned AUSA****(Lead Attorney):** Samantha Schott Bennett**Date Submitted:** 7/23/2020**Comments:**